

February 10, 2010

Mrs. Isabelle Hains
Ms. Marcella Kelly
Ms. Ana Acevedo
204 Lakeside Avenue
Bathurst NB E2A 2S7

Dear Mrs. Hains, Ms. Kelly and Ms. Acevedo:

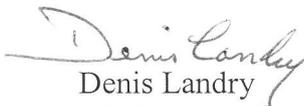
This is in response to your request under the *Right to Information Act* in which you requested copies of correspondence between the Department of Transportation and Transport Canada regarding the use of winter tires vs mixed tires on 21 passenger multi-function activity vehicles, as well as any correspondence between my Department and the Department of Education.

With respect to the documentation obtained in our department, there are some parts thereof that are being withheld. These fall into the exemption outlined in Section 6 of the *Act* indicated below:

6. There is no right to information under this *Act* where its release
(b) would reveal personal information concerning another person;

Enclosed is the information which is releasable to you under the *Act* as well as your receipt for the \$5.00 administration fee. I trust this meets with your satisfaction.

Sincerely,


Denis Landry
Minister

cc Hon. Shawn Graham, Premier
Hon. John Foran, Minister of Public Safety
Hon. Roland Haché, Minister of Education
Charlotte Valley, Director of Vehicle Management Agency
Gary Spencer, Assistant Director, Vehicle Management Agency
Valerie Kilfoil, Director of Communications, Education

Encl.

Minister/Ministre
Transportation/Transports

P.O. Box/C.P. 6000 Fredericton New Brunswick/Nouveau-Brunswick E3B 5H1 Canada Tel./Tél. (506) 457-7345 Fax/Télé. (506) 453-7987

www.gnb.ca



January 14, 2010

[REDACTED]
[REDACTED]
Safety and Security
Transport Canada
330 Sparks Street
Ottawa ON K1A 0N5

Dear [REDACTED]

Thank you for your recent response to our letter concerning the use of winter tires on the steer axle of rear wheel drive Multi-Function Activity Vehicles.

The Province would be pleased to support any physical testing that Transport Canada would be willing to undertake to resolve this issue, including the supply of one of our vehicles for use during testing. For greater clarity, the specification being used to purchase these vehicles by the Province of New Brunswick is the Canadian Standards Association CSA D270 Multi-functional activity buses standard. Typically these vehicles would not be used during heavy snow storms due to travel policy restrictions. I have asked [REDACTED] to be the contact on this matter and, as requested, I have asked her to contact [REDACTED] at Transport Canada and supply any other information required.

I welcome other interested stakeholders being informed of the testing that may be pursued; we are all in agreement that the safety of students during extra-curricular travel is of the utmost importance to us all. I also agree with the urgency of the matter and want to thank you for your assistance in addressing this important matter as quickly as possible.

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
Corporate Services and Fleet Management



A/10/4

**Transport Canada
Transports Canada**

Fax

To: [REDACTED] From: [REDACTED]
 Fax: [REDACTED] Pages: 4 Including this PAGE
 Phone: [REDACTED] Date: Jan 08, 2010
 Re: Reply to your letter CC:

Urgent For Review Please Comment Please Reply Please Recycle

● Comments:

Please find attached, Transport Canada's response to your letter dated December 01, 2009. Please note that the original will be sent to you by mail.

Thank you,

[REDACTED]



Transport
Canada
Assistant
Deputy Minister

Transports
Canada
Sous-ministre
adjoint

Safety and Security Sécurité et sûreté

Place de Ville
Ottawa
K1A 0N8

JAN 08 2010

[REDACTED]
Corporate Services and Fleet Management
Transportation
P.O. Box 6000
Fredericton, NB
E3B 5H1

Dear [REDACTED]

Subject: Usage of Winter Tires on Multi-Functional Activity Vehicles

Thank you for your letter dated December 1, 2009 regarding your concerns with all-wheel winter tire usage on your Multi-Function Activity Vehicles (MFAV's) operating as mini buses for transporting students to and from extra-curricular activities.

Firstly, with reference to your comments regarding the communications that Transport Canada officials have had with N.B. Government as well as with private citizens from your province, I would like to reassure you that Transport Canada Road Safety Directorate's personnel respond to enquiries from thousands of callers and writers each year. It is part of our service to the public and other governments to do so. Quite often, these parties do not necessarily identify themselves or provide the context of their enquiries. In the case of the N.B. MFAV issue, Transport Canada officials were simply providing information on the departmental position regarding the usage of winter tires in a transparent manner and in the spirit of service to the public. That said, Transport Canada will continue to recognize and respect the provinces' jurisdiction in all matters involving driver and vehicle licensing as well as vehicle usage laws and their enforcement. This naturally encompasses N.B.'s policies regarding the requirements for tires on vehicles that operate on your roadways.

.../2

Canada ¹¹

- 2 -

Let me assure you that Transport Canada's mandate is to protect the health and safety of the public. This is why for almost 30 years both Transport Canada and the Tire Industry as represented by the Rubber Association of Canada have been informing the public to put identical tires on all wheel positions. In winter conditions, this means that winter tires should be fitted at all wheel positions for vehicles such as those described in your letter.

As you are aware we had communicated with several tire companies for their opinions on the matter of winter tire usage. Additionally, we communicated with Ford Motor Company, the manufacturer of the cab and chassis of some MFAVs. There is broad agreement that it is advantageous to have winter tires at all wheel positions, for the varied driving duty that is expected of all motor vehicles.

It should be noted that vehicle manufacturers, including chassis manufacturers, design the handling characteristics of their vehicles around identical tires at all wheel positions. Transport Canada's understanding is that the subject N.B. vehicles have four rear wheels and two front wheels. As such, their natural handling characteristic will be to understeer due to the tire to roadway contact patch dissimilarity between front and rear. The handling characteristics will vary depending on the location and mass of the passengers and luggage being transported but will generally be a varying amount of understeer, rather than oversteer.

Increasing understeer in winter conditions by means of rib front tires could further hinder the steerability and therefore controllability of the vehicle. Additionally, their use will increase the stopping distance in snow, ice, and slush.

We have been informed that many ambulance fleets from coast to coast (including in N.B.) use winter tires at all six wheel positions to enhance handling and braking. It should also be noted that ambulances operate under all types of road conditions, and often at very high speed. Ambulances are built on vehicle chassis similar to those used for MFAV's.

Transport Canada takes the safety of the travelling public very seriously. The transportation of students is of particular importance and has led to the development of specific safety standards for school buses and for other buses that are employed as Multi-Function Activity Vehicles. These buses have an exemplary record in protecting their occupants. Transport Canada believes that the use of winter tires in all positions on light-duty vehicles further enhances their safety. This opinion has also been widely echoed by the tire industry. The only area that seems to generate some variety of opinion is the stability of MFAVs at highway speed when equipped with winter tires vs. other tires, on the front axle.

.../3

- 3 -

We take the safety concerns raised in your letter very seriously, however, this is the first time, to our knowledge, that such an issue as the potential instability of a vehicle fitted with winter tires has been raised. This is a serious allegation that we intend to fully assess.

In order to begin our assessment we would appreciate it if you or your engineering consultant could provide all available data, records of testing, theoretical calculations, or other information, which supports the allegation that the type of vehicle in question becomes unstable when fitted with winter tires in all wheel positions. Other than the allegation made in your letter, we are currently unaware of any other complaints regarding the stability of such vehicles when used with winter tires in all wheel positions.

Transport Canada is currently examining the option of physical testing of MFAVs. Hence, we would welcome the participation of the Government of N.B., including your MFAVs, in such testing. Time is of the essence since we are already over a month into the cold season and Transport Canada would need lead time to work out the logistics and estimate the incidental costs of this project. In the interest of transparency and in light of the public profile of this subject, other interested stakeholders would also be informed about any testing that may be pursued. If you wish to work with Transport Canada on this front, I request that your designated official contact [REDACTED] at Transport Canada, for further discussion. [REDACTED] can be reached at [REDACTED] or by email at [REDACTED] Transport Canada would also like to receive information on the make-up of your MFAV fleet (makes, models, model year, number of wheels and wheel sizes, Gross Vehicle Weight Rating, etc.).

Until there is convincing evidence to the contrary, Transport Canada will continue to highly recommend the use of winter tires, designated with the mountain snowflake symbol, on all wheel positions when such tires are available in the prescribed tire size, for optimum vehicle performance in winter conditions. Again, this applies to the varied driving duty that is required of all motor vehicles.

I hope that the foregoing has been beneficial and we look forward to your response.

[REDACTED] I am
sorry I could not
speak to you directly
earlier this week.
Thanks -
[REDACTED]

Yours sincerely,

[REDACTED]
Safety and Security

Reference: With regard to understeer versus oversteer, the diagrams in the following Web-page help make the distinction:
<http://www.koni.com/323+M562c0c96d4e.html>

[REDACTED]

From: [REDACTED]
Sent: Wednesday, December 16, 2009 8:39 AM
To: [REDACTED]
Subject: Tire combinations on multi function activity vehicles
Attachments: goodyear response.pdf; michelin reponse.pdf

As a follow up to my letter of December 1st, 2009, I am forwarding copies of the responses from both Goodyear and Michelin Tire on the issue of the appropriate tire combination for our rear wheel drive multi function activity vehicles. I hope that this will help in your review of this issue and that a response will be forthcoming.

[REDACTED]
Corporate Services and Fleet Management
Department of Transportation

2/1/2010

[REDACTED]

From: [REDACTED]
Sent: Friday, December 04, 2009 12:14 PM
To: [REDACTED]
Subject: RE: Opinion regarding the usage of winter tires on steering axles of small school buses



Motion Design
Rpt-MFAB Tires-N... [REDACTED]

I have consulted with a number of associates at our Global Headquarters in Akron regarding your request. Although we have not performed testing on this specific vehicle application, we are providing our opinion with regards to the usage of winter tires for these 21-passenger buses that are built on 1 ton truck chassis with dual tires on the drive axle.

We concur with your independent automotive engineer's recommendation as follows: (i) for the specific purpose of minimizing oversteer at highway speeds, the use of winter tires on the drive axle and non-winter tires on the steer axle of the subject vehicles is appropriate; and (ii) for the subject vehicles in urban application, non-highway speeds, the use of winter tires on all positions is likewise appropriate.

Please contact me if you have any further questions.

[REDACTED]

Contains Confidential and/or Proprietary Information. May Not Be Copied or Disseminated Without Expressed Written Consent of the Goodyear Tire & Rubber Company

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From: |
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| [REDACTED] (DOT/MDT) " [REDACTED]"
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To: |
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| [REDACTED]
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Date: |
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>----->
|24/11/2009 03:20 PM
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>----->
|Subject: |
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>----->
|RE: Opinion regarding the usage of winter tires on steering axles of small school buses
|

Re-sending with the attachment

From: [REDACTED]
Sent: Tuesday, November 24, 2009 4:13 PM
To: [REDACTED]
Subject: Opinion regarding the usage of winter tires on steering axles of small school buses

Thank you for contacting me to offer your assistance in the selection of the safest tire options for our 20 passenger buses. As a tire manufacturer we appreciate and value your opinion on such matters.

Recently the Province of New Brunswick has taken ownership of some twenty passenger buses which are rear wheel drive construction utilizing one ton chassis'. This size of bus had not previously been utilized in our fleet and our standard school bus tire policy was applied, that is ribbed/steering tires on the steering axle and winter or traction tires on the drive axle. Recently some individuals and tire manufacturers have suggested that RAC certified winter tires should be utilized on all axles as these buses have 16" wheels and "winter" tires are available in that size.

These buses travel as "inter-city" buses, that is, the vast majority of travel will be from one city to another, on highway, with minimal urban travel. The policy for utilization of these buses is such that travel during inclement weather is prohibited. With that said, some travel during snowfall will inevitably occur.

The province has retained the services of an independent Automotive Engineer to provide advise to us on this very important matter. I have attached his report for your review. In summary, [REDACTED] recommends that on rear wheel drive vehicles we should maintain rear axle traction dominance by installing traction/winter tires on the drive/rear axle and ribbed tires on the front/steering axle. His contention is that rear wheel drive vehicles equipped with traction/steering tires and traveling at highway speeds inherently reduce the risk of oversteer loss of directional stability, and allow the driver a better chance of maintaining or recovering directional control in an evasive or corrective action.

I would appreciate receiving your written opinion regarding the safest tire set-up for these buses. Please feel free to contact me for additional information at [REDACTED]

Your timely response would be very much appreciated.

[REDACTED]
Vehicle Management Agency
(See attached file: Motion Design Rpt-MFAB Tires-Nov-09.pdf)



3020 Avenue Jacques Bureau
Laval, Québec
H7P 6G2

December 14, 2009

Province of New Brunswick
Department of Transportation
1050 College Hill Road
P.O. Box 6000
Fredericton, N.B.

Att: [REDACTED]

The types of vehicles you will be using are common in the industry. Your present policy of fitting the steer with a rib type of tire and the drives with a Winter tread design is the right way to proceed.

The ideal situation is to have a vehicle with an understeer effect. A vehicle with oversteer is less predictable and harder to control.

Having Winter traction tire on the rear and a rib tire in the front will give you understeer. With the oversteer situation, it is in critical situations such as heavy rain, snow or icy slippery road conditions that it will manifest itself in an unexpected maneuver.

In 4X2 vehicles such as your vehicle, we recommend Rib tire on the steer and Winter traction type of tires on the rear. The importance of having a vehicle with understeer goes beyond the standard rear wheel drive type of vehicle. Even a front wheel drive vehicle in a situation where you need to replace only two tires, the industry suggests that the rear tire be replaced first. If you have your new tire on the front and worn tire in the back, you are inducing oversteer which is not a recommended situation.

Same thing applies to your vehicle, you want these to be fitted in such a way that you are not inducing oversteer, therefore Ribs on steer and Winter traction tread design on the rear axle. I hope this explanation will serve you in making your decision as to how to equip your vehicles.

Please feel free to call me if you would like to discuss this any further.

Sincerely,

[REDACTED]

Michelin North America (Canada) Inc.

December 1, 2009

[REDACTED]
Safety and Security
Transport Canada
330 Sparks Street
Ottawa ON K1A 0N5

Dear [REDACTED]

One of the recommendations from the Coroner's inquest on the Bathurst accident was that all vehicles transporting students must have winter tires. In response to this recommendation the Department of Education developed a tire policy that was reviewed by an independent expert Professional Engineer in the tire field. This expert confirmed that the appropriate tire combination for rear wheel drive vehicles is traction or winter tires on the rear axle and "ribbed" or "steering" tires on the front axle.

On November 4, 2009, [REDACTED] Road Safety Department, Transport Canada emailed our School District Superintendent and copied one of the parents, [REDACTED], from the Bathurst accident and [REDACTED] indicating that he had been in contact with [REDACTED] concerning winter tires being used on the one ton multi functional activity vehicle being used to transport students. This is the first that we were made aware that Transport Canada was discussing our tire policy for extra curricular travel vehicles. Because of the urgent nature of this issue, we directed our Professional Engineer to actively pursue resolution of this matter with Transport Canada.

Our consultant agrees with all of [REDACTED] recommendations except for rear wheel drive vehicles traveling primarily on two lane highways between cities (intercity travel) and is of the opinion that although winter tires will generally improve vehicle handling and safety for most low speed and highway situations, an "oversteer" condition can have serious consequences and must be addressed before recommending a change in policy. He has asked [REDACTED] on more than one occasion to respond to the following:

... 2



[REDACTED]
December 1, 2009

Page 2

There is concern that a public safety issue results from the recommendation to install winter tires on the front axle of multi function activity vehicles being used primarily for highway driving. The question relates to vehicle dynamics (multi function activity vehicles have relatively high and rearward centers of gravity) and rear wheel dominance will assist in the ability for a driver to resist "oversteer" in corrective or evasive actions on low traction surfaces. For this reason winter tires on the rear axle and a less aggressive tire on the front axle are recommended.

[REDACTED] has continuously responded by citing tests done at low speeds and with tire company recommendations for putting winter tires on all four wheels for better traction or where there is need for cornering, braking, hills, etc. We are trying to get confirmation that Transport Canada has given due consideration to the issue of rear wheel drive vehicle dynamics at highway speed.

I have attached a copy of our consultant's interim report, copies of his email correspondence with [REDACTED] and his recent letter stating that he is concerned with the response he has received from [REDACTED]

I bring this to your attention because I know that you will agree that the safety of students during extra-curricular travel is of utmost importance to us all. Please confirm that Transport Canada is of the opinion, based on adequate testing at highway speeds, that winter tires should be used on the steer axle of rear wheel drive multi function activity vehicles. It is urgent that we get this resolved as quickly as possible.

Sincerely,

[REDACTED]
Corporate Services and Fleet Management

Att.



DESIGN AND CONSULTING
ENGINEERS

P.O. BOX 1074, STA. A
FREDERICTON, N.B.
E3B 5G2

830 HANWELL ROAD
TEL (506) 458-9017
FAX (506) 458-9741

24 November 2009

Province of New Brunswick
Department of Transportation
Vehicle Management Agency
1050 College Hill Road
PO Box 6000
Fredericton, NB
E3B 5H1

Att: [REDACTED]

RE: TRANSPORT CANADA'S RESPONSE / OUR LAST INQUIRY FOR
SUPPORT DOCUMENTATION AND CONTACT INFORMATION

This latest response from [REDACTED] Transport Canada, gives rise to concern as to the process behind their policy and recommendation procedures, and the resulting communications with the public and end users.

As you are aware, we had requested support documentation or information leading to the general recommendations by Transport Canada Road Safety, following the statement:

" Transport Canada highly recommends the use of winter tires, designated with the mountain snowflake symbol, on all wheel positions when such tires are available in the prescribed tire size. Since these MFAV's currently have all season tires on the front and winter tires on the rear we highly recommend that the same Nokian tires be installed on the front as well as the rear. This will improve vehicle stability, steerability and braking in winter conditions."

As previously stated we have agreed with this position on front wheel drive vehicles, all wheel and four wheel drive vehicles, and we agree that at lower speeds benefits can be had for all vehicles so equipped. We were, and still are concerned with the general overall recommendation that includes rearwheel drive vehicles that travel at

highway speeds. Unless rear traction dominance is maintained on this type of vehicle, there is a high risk of loss of lateral stability resulting from an "Oversteer" condition during evasive or corrective actions on low traction surfaces. This can be overcome in vehicles equipped with Electronic Stability Control systems. The vehicles in question are not so equipped, and a loss of vehicle stability due to "Oversteer" presents an extremely dangerous situation and has been documented to produce serious and often fatal results.

Where this condition is recognized, it must be addressed before adopting the general and all encompassing recommendations from Transport Canada.

As you are aware, our requests to Transport Canada have resulted in a maintaining of their position, despite our identification of this area of concern, and requests for assistance. The concerns have not been addressed and replies include references to general documentation that does not address our areas of concern, personal opinions, and anecdotal references to input from various sources.

There has been an indication of the understanding of our concern from various references as forwarded to us by [REDACTED]

Rubber Manufacturers Association / Replacement Guidelines for Passenger and Light Truck Tires:

" If winter/snow tires are installed on the rear axle of any vehicle, it is recommended (but not required) that they also be installed on the front axle".

"Placing greater traction on the rear axle on wet surfaces is necessary to prevent a possible oversteer condition and loss of vehicle stability."

Bridgestone Tire:

" If winter/snow tires are installed on the rear axle of any vehicle, it is recommended, but not required, that they also be installed on the front axle".

"In winter driving conditions, vehicle control and safe operation under braking and cornering is especially dependent upon the rear tires. For this reason, winter tires are best applied to all

wheel positions, and a necessity if winter tires are applied to the front axle of any vehicle."

Certain Northern European Jurisdictions recognize the concern, as well as certain European Manufacturers who produce "Winter Designated" tires for both drive and steer positions with different tread patterns, again to maintain rear traction dominance.

Our concerns are still based on an identifiable Public Safety Issue, and we cannot recommend dropping this issue without input that addresses these concerns from Transport Canada, or other authority. This is a vehicle dynamics problem, not limited to but affected by tire installation. The response from [REDACTED] is not acceptable and does not address the concern. We do not agree that addressing an identifiable serious safety concern should be considered a waste of his or Transport Canada's time.

[REDACTED]

Cc: [REDACTED] DOT
[REDACTED] ED





DESIGN AND CONSULTING
ENGINEERS

P.O. BOX 1074, STA. A
FREDERICTON, N.B.
E3B 5G2

830 HANWELL ROAD
TEL (506) 458-9017
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22 November 2009

Province of New Brunswick
Department of Transportation
Vehicle Management Agency
1050 College Hill Road
PO Box 6000
Fredericton, NB
E3B 5H1

Att: [REDACTED]

RE: USAGE OF WINTER DESIGNATED TIRES ON PASSENGER
VEHICLES AND LIGHT BUSES

Confirming our conversations with respect to the usage of Winter Designated Tires on Dept of Education administered vehicles, we had previously reviewed the policy used by Education and concurred with the policy contents.

The recommendation was to ensure all front wheel drive, all wheel drive, and four wheel drive vehicles be equipped with Winter designated Tires, carrying the "Snow Flake and Mountain Peak" symbol, at all wheel positions. For light busses based on LT Chassis, and larger busses, the recommendation was to keep the policy in effect and install such tires on the drive position only. Steer positions should continue to be equipped with appropriate rib style tires that are less aggressive than on the drive positions.

We agree that for heavy snow conditions there will be an improvement in steering and braking abilities at lower or urban speeds with winter tires installed in all positions, however for weather controlled operational profiles that include significant highway speed usage, we concur and recommend that the winter traction tires be confined to the drive positions, as in virtually all commercial and highway usage vehicles that are rear drive.

There is a common concern with highway speed usage in low traction conditions for the risk of loss of lateral vehicle stability during an evasive or corrective manoeuvre, such as the sudden encounter with slush, black ice, snow rutting. Etc. The loss of control concern in

question is that of rear end skidding, or "oversteer". This situation is identifiable and can present on perfectly straight sections of highway within legal posted speeds. Vehicle operators can drive vehicles with appropriate caution and procedures to address normal steering, stopping, and braking situations when dealing with normal intersection and turning situations. The sudden loss of lateral control risk is difficult to anticipate and address. This is an identifiable concern and numerous incidents occur on public highways each year that cause serious injuries and/ or loss of life. These incidents arise from loss of vehicle control or "oversteer" situations in both wet highways in warmer seasons and snow and ice conditions in winter.

Front wheel drive vehicles have historically been more prone to such situations, and manufacturers of vehicles, vehicle systems, and tire manufacturers have introduced significant developments including, Anti Lock brakes, Electronic Stability Control systems, and appropriate rain and winter adaptive tires for this common end. The objective is to allow the operator to maintain vehicle directional control in adverse conditions, in particular to prevent or limit "oversteer" in corrective actions.

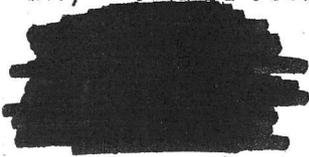
Rear drive vehicles have an inherent tendency to resist the "oversteer" tendency common to front wheel drive vehicles, and can be helped to maintain this characteristic by ensuring rear traction dominance. In low traction conditions, high traction tires on steer positions can, in evasive and correctional actions, risk excessive front end braking or steering forces that can cause excessive vehicle rotation that can induce excessive rear tire slip angles and rapid loss of directional control.

We would agree that "steer" position and "drive" position winter designated tires that certain manufacturers market in Europe would be ideal and suitable for winter conditions. However as in heavy truck tires the same "drive" traction tires on all positions does not appear to be recommended for reasons of reducing the rear traction dominance for low traction winter conditions.

We agree that Winter designated tires for all positions will produce improvements at lower identified speeds, however with the identifiable risk of control loss during highway evasive or corrective actions, we will not be changing our recommendation for winter tire usage on the drive only positions to maintain rear traction dominance. These vehicles in question that are operated under control of the Department

of Education are used in weather condition controlled operations, and exposure to the majority of low traction situations can be controlled.

Improvements are continually being made in both vehicle safety systems and tire technology that will ultimately address these concerns. We have requested to be privilege to the documentation and testing results upon which Transport Canada has based their general recommendation that " Where winter designated tires are available they should be used on all wheel positions", to offset our concerns,



[REDACTED]

From: [REDACTED]
Sent: Thursday, November 26, 2009 2:13 PM
To: [REDACTED]
Subject: Fw: RE: Winter tires

--- On Fri, 11/20/09, [REDACTED]

From: [REDACTED]
Subject: RE: Winter tires
To: [REDACTED]
Received: Friday, November 20, 2009, 9:54 AM

[REDACTED]
Since you are the only one believing that winter tires are not safer on the front as well as the rear I suggest that you perform your own testing to prove the rest of us wrong. Sorry to be so blunt but this has taken up enough of my time already.

[REDACTED]
Road Safety Department
Transport Canada
2780 Sheffield Rd
Ottawa, ON
Canada
K1B 3V9

[REDACTED]
<http://www.tc.gc.ca/vehiclerecalls>
<http://www.tc.gc.ca/rappelsvehicules>

From: [REDACTED]
Sent: November 19, 2009 12:51 PM
To: [REDACTED]
Subject: RE: Winter tires

Thank you [REDACTED]

We appreciate your comments, however the request was for any documentation or test results you can identify that will address the highway speed scenario. This is a very real issue, and the general opinions that seem to be forthcoming are dealing with normal day to day winter driving. The concern is still the ability to prevent or to minimize the risk of "oversteer" in a reactive situation, the worst of which is at highway speeds for any vehicle equipped with any tire combination.

Will you please respond to the questions in our 3 previous E-Mails.

11/27/2009

In hopes of having our concerns addressed, may we have the contact information for the Companies and individuals referred to in your E-mails. Safety is still our collective concern and it would be appropriate if these contacts can assist.

--- On Tue, 11/17/09, [REDACTED]:

From: [REDACTED]
Subject: RE: Winter tires
To: [REDACTED]
Cc: [REDACTED]
Received: Tuesday, November 17, 2009, 3:53 PM

[REDACTED]
I questioned Nokian on this issue and they responded as follows;

All C- type cars (vans , minibusses) where they use C / LT type tyres sizes 17 inch and below , they use in winter time same kind of special winter tyres both front and rear axles. We do not fully agree [REDACTED] comment that 'using winter tyres both front and rear axle they can increase risk of a spin or fistailing'.

As you know Nokian winter tires are currently installed on the rear of the subject vehicles.

Bridgestone tire has responded with the following;

In winter driving conditions, vehicle control and safe operation under braking and cornering is especially dependent upon the rear tires. For this reason, winter tires are best applied to all wheel positions, and a necessity if winter tires are applied to the front axle of any vehicle.

Some vehicles have specific recommendations regarding winter tires and their usage; always check and follow the vehicle placard and/or the vehicle owner's manual.

- Winter tires are best applied to all wheel positions
- If winter tires are applied to the front axle of any vehicle, they must also be installed on the rear. Do not apply winter tires to only the front axle – this applies to all passenger cars and light trucks, including front wheel drive, 4x4 and all-wheel drive vehicles
- If winter tires are installed on the rear axle of any vehicle, it is recommended, but not required, that they be installed on the front axle

I don't understand why you believe that highway speeds will result in instability if you install winter tires in all positions on a rear wheel drive but not on all wheel drive or front wheel drive. Our belief is that you need traction on the front tires as well as the rear tires so that you can decrease stopping distance and are able to steer the vehicle.

I would like to add that for many years I ice raced rear wheel drive and front wheel drive vehicles with winter tires on the front and rear and would not consider doing this if I only had winter tires on the rear.

11/27/2009

My racing speeds were up to 200 kph, far exceeding highway speeds, and the vehicles handled the same at high or low speed. I also own dual rear wheel trucks and vans so have some experience with their handling characteristics.

I trust that by now you have viewed the winter tire videos on the RAC web site so have seen the difference that equal front/rear traction has.

A loss of steerability and brake ability at highway speeds does indeed have grave consequences.
Sincerely,

[REDACTED]
Road Safety Department
Transport Canada
2780 Sheffield Rd
Ottawa, ON
Canada
K1B 3V9

[REDACTED]
<http://www.tc.gc.ca/vehiclerecalls>
<http://www.tc.gc.ca/rappelsvehicules>

From: [REDACTED]
Sent: November 17, 2009 2:35 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: Winter tires

[REDACTED]
Thank you for your response. I apologize for the delay in responding.

The information you have included is valid for most applications, however these include general recommendations in a generic form. For Transport Canada to take a strong position it would appear this position is based on solid test reports and qualified studies rather than on opinions expressed. Once again, may we be privilege to this information ?

The information you have included does not show any reference to highway speed scenarios, notably increase or loss of traction or lateral stability. There are documented benefits to winter rated tires all around in significant snow accumumations, hard packed snow, etc for low speed traction, braking and control, notably for front wheel drives, all wheel drives, and **rear wheel drives**. There is however no ready access to information for highway speed conditions, and vehicle stability. Can you help us here?

The low speed benefits are far outweighed by the risks of loss of lateral stability and vehicle control at highway speeds. As you are aware, black ice, slush, snow rutting can all have a tendency to momentarily "pull" a vehicle laterally. The natural reaction is to lift off the throttle and correct. The driver may not have time to react and follow the recommended procedures for corrective action before complete loss of control and direction. As you know, rear wheel drive vehicles will have a slight tendency to rear drag, and with a rear traction dominance, a tendency to hold the vehicle in the original direction of travel. Front wheel and all wheel drive vehicles do not react in a similar manner. For this condition the recommendation to install winter traction

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tires on all positions for rear wheel drives must come under question.

A loss of lateral stability at highway speeds risks grave consequences, and cannot be ignored.

In the information you identified for us, on page 4 of the "Replacement Guidelines for Passenger and Light Truck Tires", the paragraph "Replacing two Tires" contains the following statement....."Placing greater traction on the rear axle on wet surfaces is necessary to prevent a possible oversteer condition and loss of vehicle stability." This statement will reflect the vehicle dynamics in all low traction situations and mirrors our concern.

You have our assurances that we maintain that the safety of the travelling public is absolutely vital and should not be compromised. With this identifiable safety related concern, we need to be privelege to any offsetting documentation to alleviate our concerns-.

Traction tire recommendations all around have not addressed the large commercial sector. most trucks and busses will have similar dynamics and reactions

Thanking you

[REDACTED]

-- On Thu, 11/12/09, [REDACTED]

From: [REDACTED]
Subject: Winter tires
To: motiondesignltd@yahoo.com
Received: Thursday, November 12, 2009, 10:59 AM

Hi [REDACTED]

The following is the Rubber Accociation of Canada recomondation with regard to winter tires

o Winter/Snow tires - It is always preferable to apply winter/snow tires to all wheel positions, including duals, to maintain vehicle mobility and control.

o If winter/snow tires are applied to the front axle of any vehicle, winter/snow tires must also be installed on the rear axle. DO NOT apply winter/snow tires only to the front axle. This applies to all passenger and light truck vehicles including front-wheel-drive, 4WD, and AWD vehicles.

WARNII{GI Without winter/snow tires on the rear axle, which have comparable traction qualities to the tires on the front axle, the vehicle may experience adverse handling characteristics. This may result in loss of vehicle control, which could cause serious injury or death.

o If winter/snow tires are installed on the rear axle of any vehicle, it is recommended (but not required) that they also be installed on the front axle.

The attachment below is the Rubber Manufacturers Association recommendation.
<<RMA Tire Replacement Guidelines.pdf>>

I hope this helps in your request for documentation.
[REDACTED]

11/27/2009

[REDACTED]
Road Safety Department
Transport Canada
2780 Sheffield Rd
Ottawa, ON
Canada
K1B 3V9

[REDACTED]
<http://www.tc.gc.ca/vehiclerecalls>
<http://www.tc.gc.ca/rappelsvehicules>

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[REDACTED]

From: [REDACTED]
Sent: Thursday, November 26, 2009 3:42 PM
To: [REDACTED]
Subject: Fw: RE: Winter tire Recommendations

--- On Fri, 11/6/09, [REDACTED]

From: [REDACTED]
Subject: RE: Winter tire Recommendations
To: [REDACTED]
Cc: [REDACTED]
Received: Friday, November 6, 2009, 4:28 PM

[REDACTED]
I thank you for your comments and I encourage you to continue to dialogue with [REDACTED]
[REDACTED]

From: [REDACTED]
Sent: Friday, November 06, 2009 4:13 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Winter tire Recommendations

Thank you for your timely response on this matter, and of the usage of winter tires for MFABs. We agree that issues such as this must be addressed in a manner that ensures the optimum with respect for Public Safety. You have our assurances that we will in no way make decisions or recommendations that would knowingly compromise this principle.

We believe some of our statements were taken out of context however, but we agree with Transport Canada's position and documentation from TC and the Rubber association of Canada, identified for us on the usage of "Winter Tires". These tires being properly identified with the Snowflake and Mountain Peak symbol". Their usage cannot be faulted on front wheel drive passenger cars, all wheel drives, and four wheel drive vehicles.

Our recommendations were to use "Winter Tires" or "Traction Tires" on drive positions only for rear wheel drive vehicles. This is in context where the vehicles in question are controlled usage vehicles for which their operation can be generally limited to good winter road conditions, bare or snow packed. We agree that in snow conditions, improvements can be had in steering and stopping distances at low speeds. However, recommendations must be based on all identifiable conditions, All of the tests and documentation we have examined show marked improvements at urban speed conditions with winter tires, but only marginal at highway speeds and marginally worse on bare pavement conditions. Our concern is for incident loss of lateral stability or skidding at highway speeds. As you are aware this condition can be induced by emergency

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situation braking, evasive steering action, or even by slush patches or black ice conditions. We concur with TC's published procedures for skid control, however including reaction time and completing the recommended procedures, several seconds can elapse with the vehicle travelling several hundred meters. This is in fact if the driver can actually regain control. The risk as you are aware is for the resulting possible intrusion into the oncoming lane of traffic on two lane highways, or leaving the road. Both of these situations are identifiable and occur at undesirable frequencies with often serious consequences.

Antilock brakes, Electronic stability control systems, and the usage of winter tires are all intended to assist in maintaining directional control of vehicles on the highway. It is our opinion and that of the majority of contacts we have, that backing off the accelerator on a rear wheel drive vehicle will induce a slight retarding action at the rear axle, and as such to assist in regaining vehicle stability. Under such circumstances the situation will be improved with rear traction dominance.

During our conference call yesterday [REDACTED] strongly disagreed with this, and stated "Where winter tires are available they should to be used on all positions." When asked he indicated this is based on "Years of testing, TC's documentation and documentation from The Rubber Association." We were not able to access any such documentation, notably for rearwheel drive vehicles." May we have the pertinent testing results and specific documentation supplied or identified for us, to allow us to evaluate our position? Again Public Safety is paramount.

There is another area of concern that arose from the telephone conversation. This concern is for all commercial and heavy vehicles, the majority of which are rearwheel drive. Although heavy truck tires do not fall in the specific class of "Designated Winter Tires", each of the manufacturers identified as producing "Winter Tires" and heavy truck tires, all have tires listed as suitable for snow conditions, similarly based on decades of design, testing, and usage with appropriate tread configurations. They all designate these as suitable for "drive positions", with other rib styles designated as "steering" or "trailer". If the recommendation by TC and the Rubber association is for MFABs to be equipped with "snow tires on all positions", similarly "Snow Condition Traction Tires" should be used on all heavy trucks, intercity busses, tractor trailers, utility vehicles, etc. based on the same facts, observations and conclusions.

Has Transport Canada started a program to advise these users of the all position requirement recommendations? . None of the fleets, utilities, or government fleet operators we are in contact with is aware if any such action. It is presently unclear how the MFABs might be considered and not school busses and intercity busses also as a minimum. Passenger safety considerations you will agree are of equally of concern in each case.

We thank you for your assistance in helping us clarify our position.

[REDACTED]

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11/27/2009

[REDACTED]

From: [REDACTED]
Sent: Thursday, November 05, 2009 2:59 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Transport Canada Recommendations for Winter tires to be Used on the Front of MFAB Vehicles

Here is the latest information we have received from TC. Please feel free to provide us with your reaction to this so that we can continue to move forward. Thanks.

From: [REDACTED] (ED) On Behalf Of [REDACTED] (ED)
Sent: November-05-09 2:53 PM
To: [REDACTED] (ED); [REDACTED] (ED)
Cc: [REDACTED] (ED)
Subject: FW: Transport Canada Recommendations for Winter tires to be Used on the Front of MFAB Vehicles

FYI

[REDACTED]

Administration & Finance / Administration & Finance Branch
Ministère de l'Éducation / Department of Education
Place 2000, Fredericton, NB
Tel: [REDACTED]
Fax: [REDACTED]

From: [REDACTED]@tc.gc.ca]
Sent: November-05-09 1:46 PM
To: [REDACTED] (DPS/MSP)
Cc: [REDACTED] (ED)
Subject: RE: Transport Canada Recommendations for Winter tires to be Used on the Front of MFAB Vehicles

[REDACTED]

Here are some salient excerpts from what my staff have responded to me with. I think that it is well-considered and have assessed and fully support their position. In a nutshell, TC disagrees with your engineering consultant's views regarding winter tires on rear axle only for rear-wheel drive vehicles.

I hope that this helps [REDACTED]. But I also understand that it may be difficult dealing with your media about this. You will also see that [REDACTED] did not provide the context and so we dealt with her as we do with close to 40,000 other callers and emailers each year.

TC also recognizes that the decision regarding the choice of tires is at the discretion of the vehicle owner.

Regards;

[REDACTED]

From TC Road Safety staff.

2/1/2010

"The information provided by [REDACTED] is factual and is in line with what we have on our web site. It also dovetails with the information provided by the Rubber Association of Canada (RAC). [REDACTED] has had direct conversation with [REDACTED] this morning, but we still do not fully understand how [REDACTED] arrived at his conclusion. [REDACTED] has also contacted the RAC this morning. The RAC is standing behind the information they have published but, for greater certainty, they will go back to the technical committee and get back to us ASAP."

"You should also know that [REDACTED] did not fully identify herself when she first talked to [REDACTED]. The information that was provided to her is the same that would have been provided to any member of the public contacting our 1-800 lines."

"For your information, I am attaching the following links regarding winter driving and Transport Canada's and the RAC's recommendations regarding the installation of four winter tires. This includes a press release by [REDACTED]

<http://www.tc.gc.ca/eng/roadsafety/tp-tp2823-winter-424.htm>

<http://www.tc.gc.ca/eng/roadsafety/safevehicles-safetyfeatures-winterdriving-index-693.htm>

<http://www.tc.gc.ca/mediaroom/releases/nat/2008/08-h001e.htm>

<http://www.rubberassociation.ca/wintertires.html>

http://www.rubberassociation.ca/pdf_docs/Winter%20Tires/3678_RAC_winter_en_Web.pdf

"I have had a conference call with [REDACTED] and members of the NB school board this morning. I explained our position which was based on decades of consumer complaints, crashes, testing, motoring journals, and tire industry involvement. [REDACTED] is of the belief that winter tires in all locations is only safe on front wheel drive and all wheel drive vehicles. He believes that rear wheel drive vehicles should only have winter tires on the rear as they are "unstable at highway speeds otherwise".

"I still stand by my statement;

"Transport Canada highly recommends the use of winter tires, designated with the mountain snowflake symbol, on all wheel positions when such tires are available in the prescribed tire size."

[REDACTED]

From: [REDACTED] (DOT/MDT)
Sent: Wednesday, November 04, 2009 9:10 AM
To: [REDACTED] (ED)
Cc: [REDACTED] (DOT/MDT)
Subject: TC opinion on winter tires

Hi again

I suggest that [REDACTED] call [REDACTED] at TC to discuss his opinion regarding utilization of 4 winter tires. I would like to participate in the conversation and I suspect that [REDACTED] may want to as well. Following that conversation [REDACTED] can re-visit his opinion (if necessary) and provide us with written direction/advise.

[REDACTED]
Vehicle Management Agency

2/1/2010

[REDACTED]

From: [REDACTED]
Sent: Wednesday, November 04, 2009 9:41 AM
To: [REDACTED]
Cc: [REDACTED] (ED); [REDACTED] (DOT/MDT)
Subject: RE: FW: Isabel Hayne and winter tires

so let me know when you would like to call him, I can come over or join by conference call.

From: [REDACTED] [mailto:motiondesignltd@yahoo.com]
Sent: Wednesday, November 04, 2009 9:33 AM
To: [REDACTED] (DOT/MDT)
Subject: Re: FW: [REDACTED] and winter tires

Thanks [REDACTED]. It would appear so on the surface! There are several questions that [REDACTED] should be asked.

What is the purpose of antilock brakes ?

Snow tires became recommended on all positions early on with front wheel drives. Why ?

Why do intercity buses and highway tractors not follow his advice?

How does he account for the high number of fatal accidents with front wheel drive vehicles losing control on rain soaked highway surfaces, and leaving the road or crossing over into incoming traffic?

There is no question that at low speed snow tires will slightly improve steering and braking conditions with minimal risk, and in urban conditions benefits can be realized.

At highway speeds, a loss of lateral stability frequently results in a fatal outcome, a condition that can be knowingly avoided or reduced.

This should not be dropped, and [REDACTED] should be asked to address this situation.

[REDACTED]

--- On Wed, 11/4/09, [REDACTED] (DOT/MDT) [REDACTED] wrote:

From: [REDACTED] (DOT/MDT) [REDACTED]
Subject: FW: [REDACTED] and winter tires
To: [REDACTED] <motiondesignltd@yahoo.com>
Cc: "[REDACTED] (DOT/MDT)" [REDACTED]
Received: Wednesday, November 4, 2009, 6:55 AM

Hi again [REDACTED]

From: [REDACTED] (ED15) [mailto:[REDACTED]]
Sent: November 3, 2009 11:26 AM
To: [REDACTED]
Cc: [REDACTED] (ED)
Subject: Re: [REDACTED] and winter tires

Hello [REDACTED]
Thank you for the email. Our district follows the protocol established by the Department of Education under its new Policy 513.

I will forward your email to the appropriate people at the Department of Education. We take our direction from that level.

Thanks again for the email. This issue is of great concern to all of us as student safety is of the highest importance.

Sincerely,

[REDACTED]
School District 15

From: [REDACTED]
To: [REDACTED] (ED15)
Cc: [REDACTED] (ED)
Sent: Tue Nov 03 12:14:56 2009
Subject: [REDACTED] and winter tires

Hi [REDACTED]
I have been in contact with [REDACTED] who informs me that she has been in contact with you regarding the use of winter tires on the one ton multi functional activity vehicle which is currently equipped with Nokian winter tires on the rear only.
She informs that your school board policy prescribes rib tires on the front and traction tires on the rear for yellow school buses and that this policy is being used on these one ton multi function activity vehicles as well as the large school buses.

Transport Canada highly recommends the use of winter tires, designated with the mountain snowflake symbol, on all wheel positions when such tires are available in the prescribed tire size.

Since these MFAV's currently have all season tires on the front and winter tires on the rear we highly recommend that the same Nokian tires be installed on the front as well as the rear. This will improve vehicle stability, steerability and braking in winter conditions.

The reason that I have been asked to comment on this is that I produced a series of winter tire demonstration videos, teach winter driving skills, and sit on an advisory comitee with the Rubber Association of Canada. Our comitee will shortly be regulating the use of the mountain snowflake symbol here in Canada. Additionally we are looking into regulating ice traction as well as the current snow traction requirements prescribed by this mountain snowflake symbol.

Sincerely,
[REDACTED]
Road Safety Department
Transport Canada
2780 Sheffield Rd

Please read this message all the way to the bottom. It appears that TC is contradicting your opinion?

From: [REDACTED] (ED)
Sent: Tuesday, November 03, 2009 2:35 PM
To: [REDACTED] (DOT/MDT)
Cc: [REDACTED] (DOT/MDT)
Subject: Fw: [REDACTED] and winter tires

FYI. I will touch base with you on this tomorrow when I get back to the office. I need to talk to [REDACTED] and our outside consultant on this again to determine our go forward response.

Sent from my BlackBerry Wireless Handheld

From: [REDACTED] (ED15)
To: [REDACTED] (ED); [REDACTED] (ED)
Sent: Tue Nov 03 14:18:39 2009
Subject: FW: [REDACTED] and winter tires

FYI

From: [REDACTED]
Sent: Tuesday, November 03, 2009 2:18 PM
To: [REDACTED] (ED15)
Cc: [REDACTED] (ED)
Subject: RE: [REDACTED] and winter tires

Thanks [REDACTED]

Hopefully the policy will be changed as a result of our experience in this matter.

[REDACTED]
Road Safety Department
Transport Canada
2780 Sheffield Rd
Ottawa, ON
Canada
K1B 3V9
[REDACTED]

<http://www.tc.gc.ca/vehiclerecalls>
<http://www.tc.gc.ca/rappelsvehicules>

Ottawa, ON
Canada
K1B 3V9



<http://www.tc.gc.ca/vehiclerecalls>
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[REDACTED]

From: [REDACTED] (ED)
Sent: Tuesday, November 03, 2009 2:35 PM
To: [REDACTED] (DOT/MDT)
Cc: [REDACTED] (DOT/MDT)
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To: [REDACTED] (ED); [REDACTED] (ED)
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[REDACTED]
Road Safety Department
Transport Canada
2780 Sheffield Rd
Ottawa, ON
Canada
K1B 3V9

[REDACTED]

<http://www.tc.gc.ca/vehiclerecalls>
<http://www.tc.gc.ca/rappelsvehicules>

From: [REDACTED] (ED15) [REDACTED]
Sent: November 3, 2009 11:26 AM
To: [REDACTED]
Cc: [REDACTED] (ED)
Subject: Re: [REDACTED] and winter tires

2/1/2010

Hello [REDACTED]

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Sincerely,

[REDACTED]
School District 15

From: [REDACTED]
To: [REDACTED] (ED15)
Cc: [REDACTED] (ED)
Sent: Tue Nov 03 12:14:56 2009
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Sincerely,

[REDACTED]
Road Safety Department
Transport Canada
2780 Sheffield Rd
Ottawa, ON

2/1/2010

Canada
K1B 3V9



<http://www.tc.gc.ca/vehiclerecalls>

<http://www.tc.gc.ca/rappelsvehicules>